

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: David D Morgan

CHAPTER 13

CASE NO. 16-12334-jkf

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NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE

West Coast Servicing, LLC has filed a **MOTION FOR RELIEF FROM AUTOMATIC STAY** with the court to permit foreclosure of a lien on real property located at 856 South Front Street, Philadelphia, PA 19147. **West Coast Servicing, LLC** also seeks relief from the Co-Debtor stay pursuant to 11 U.S.C. §1301, *et seq.*

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **August 8, 2016** you or your attorney must do **all** of the following:

- (a) file an answer explaining your position at:
U.S. Bankruptcy Court
Eastern District of PA
Bankruptcy Clerk of Courts
900 Market Street, Suite 400 Philadelphia, PA 19107

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's Attorney:
J. Eric Kishbaugh, Esquire
UDREN LAW OFFICES, P.C.
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400
(856) 669-5399 FAX

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Jean K. FitzSimon on **August 24, 2016 at 9:30am, Courtroom 3**, United States Bankruptcy Court, Eastern District of Pennsylvania 900 Market Street, Suite 400 Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

By: /s/ J. Eric Kishbaugh
J. Eric Kishbaugh, Esquire
UDREN LAW OFFICES, P.C.
Attorneys for Movant
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400

Date: July 25, 2016